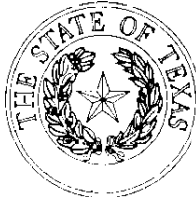


Rebecca Klein  
Chairman

Brett A. Perlman  
Commissioner

W. Lane Lanford  
Executive Director



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## Public Utility Commission of Texas

September 26, 2002

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, SW  
Washington, DC 20554

RE: TRS State Certification Application

In the Matter of

Telecommunications Services for	)	
Individuals with Hearing and	)	
Speech Disabilities, and the	)	CC Docket No. 98-67
Americans with Disabilities Act of	)	
1990	)	

Dear Ms. Dortch:

The Public Utility Commission of Texas (hereinafter referred to as Texas PUC) hereby submits its application to the Federal Communications Commission (FCC) for State Certification of our state's Telecommunications Relay Service (TRS). In 1989 the Texas Legislature directed the Texas PUC to establish a statewide TRS for all Texans, including the deaf, hard-of-hearing, speech-impaired, deaf-blind and hearing. The Texas PUC awarded a five-year contract for the provision of TRS to Sprint in March 1990. The service, henceforth referred to as Relay Texas, carried its first call on September 1, 1990. The Texas PUC also awarded a five-year contract to Sprint in 1995 and again in September 2000. The current Sprint contract continues until August 31, 2005.

Attached is the Texas PUC's narrative document describing Relay Texas in accordance with the requirements set forth in the FCC's Public Notice released on May 1, 2002. The FCC's rules for the provision of TRS pursuant to Title IV of the Americans with Disabilities Act

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(**ADA**), 47 U.S.C. § 225, are codified at 47 CFR § § 64.601-605. Pursuant to 47 C.F.R § 64.605(b), a state desiring FCC state certification of its TRS program must establish that:

1. The state program meets all operational, technical, and functional minimum standards contained in 47 C.F.R § 64.604;
2. The State program makes available adequate procedures and remedies for enforcing the requirements of the state program; and
3. Where a state program exceeds the mandatory minimum standards contained in § 64.604, the state establishes that its program in no way conflicts with federal law.

The Texas PUC's documents show that Relay Texas meets the minimum standards as outlined above. Relay Texas provided individuals who have a hearing or speech disability or a hearing-visual disability with telephone services that are functionally equivalent to those provided to individuals without such disabilities. Relay Texas enables a two-way communication between ~~an~~ individual who uses a Text Telephone (TTY) or other non-voice terminal device (including video conferencing) and an individual who does not use such a device. Relay Texas provides telephone interpreting service between people who can hear and those who have a disability of hearing or speech, or both. Relay Texas provides unrestricted state-wide and nation-wide TRS.

Since the creation of Relay Texas, the Texas PUC, Sprint, and citizens who have a hearing or speech disability have worked closely to ensure that Relay Texas is a **high** quality TRS that meets the needs of its users. The Texas Legislature created a fifteen-member Relay Texas Advisory Committee to assist the Texas PUC ~~in~~ overseeing the TRS provided by Relay Texas. Members of the Relay Texas Advisory Committee represent various groups, including the following:

1. people who are hearing-impaired (deaf, hard-of-hearing)
2. People who are speech-impaired
3. People who **are** deaf-blind
4. people who have disabilities other than those of hearing and speech
5. other consumers
6. telephone industry representatives (local and long distance)

**As** of this writing, more than eighty percent of the members of the Committee represent disabled groups.

---

Contact **persons** regarding this application are as follows:

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Sincerely,

Lane Lanford  
Executive Director

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**EXHIBITS.**

Exhibit A: PUC Subst. R. §26.414. Telecommunications Relay Service (TRS).

Exhibit B: Sprint TRS Training Outline

Exhibit C: Confidentiality of Conversation Bill

Exhibit D: Sprint's Pledge of Confidentiality for CAs

Exhibit E: Relay Texas Standard Features Matrix

Exhibit F: Sprint's Quality Assurance Program on Speed of Answer

Exhibit G: Sample of Sprint's Carrier of Choice letter

Exhibit H: Disaster Recovery Plan

Exhibit I: The RAP Request for Proposals

Exhibit J: Texas PUC Subchapter P, Texas Universal Service Fund, Substantive Rule  
§26.401

Exhibit K: Sprint Complaint Log

**Portable Document Format File (PDF)**

Texas TRS Supplemental.pdf

- RT Newsletter
- Web Site
- SBC Directory Relay Texas example
- Big Bend Directory Relay Texas example
- TX ASA data
- Relay Texas Brochure

TX RFP 2000.pdf

## Overview

In 1989, the Texas Legislature authorized the Public Utility Commission of Texas (hereinafter referred to as the Texas PUC) to establish a Telecommunications Relay Service (TRS). In accordance with its responsibilities to oversee the TRS program, the Texas PUC promulgated Substantive Rule § 26.414 (Exhibit A) which regulates the provision of telecommunications relay services in Texas. In Texas, TRS is known as Relay Texas (RT). The Texas PUC contracts with Sprint to provide RT. From 1990 to 1995, Texas had one relay center located in Austin. In 1995, Sprint added a second center in Lubbock, Texas. In order to maintain a low ASA, the contract with Sprint allows up to 20% of Texas calls to be routed to other Sprint centers outside of Texas. Sprint TRS trains other centers with the same training system as provided for Texas centers. Speech-to-speech service is 100% routed to a specialized center in Missouri. Since its inception, Relay Texas has experienced steady and constant growth, processing approximately 50,000 calls in September 1990 and 447,439 calls in July 2002.

The Texas PUC remains committed to maintaining a TRS that provides telephone access for persons with hearing and speech disabilities that is functionally equivalent to the telephone access provided to those who do not have such disabilities. In addition, Relay Texas provides TRS to hearing persons who need to contact persons with speech and hearing disabilities. Texas plans to continue providing quality telecommunications services to those who have specialized needs and intends to keep abreast of expanding technology in order to better serve the users of the Relay Texas system. Furthermore, Texas has made strides to stay ahead of the game by

implementing services, like speech-to-speech relay and video relay, before those services are part of the mainstream in other state relay programs. Texas takes to heart its mission to make telecommunications available to all its citizens. The **Request** for Proposal for the provision of TRS (See Portable Document Format File: TX RFP 2000.pdf filed separately) was written to meet the criteria established by Title IV of the **ADA** as well as to meet guidelines set forth in Substantive Rule § 26.414.

Sprint has supplied Relay Texas data to the Texas PUC which has been incorporated into this report.

**§ 64.604 Mandatory Minimum Standards:**

(a) Operational Standards.

(1) Communication Assistant (CA)

Sprint implements extensive employee recruitment and selection procedures to ensure that persons who are selected and employed as CAs meet proficiency requirements. **The** minimum **CA** qualifications are as follows:

i) Employment Standards.

The first step in the CA's hiring process is a validated test that screens for typing, language **skills**, and other skills related to the CA position. When an applicant passes the test, a Human Resources representative screens the applicant over the phone or in person, for oral communication skills and **work** availability. If the applicant passes this step, he/she is interviewed in person by an Operations Supervisor for specific job dimensions that relate to the success of a CA. If the supervisor recommends the applicant for employment, the applicant undergoes a drug screen and security/reference check. This process ensures that only qualified applicants are hired to **work** at a relay center.

ii) Communications Assistant Training Program

Sprint trainers use adult learning theories and training is adapted to each participant's learning modality. Sprint incorporates lecture, visual graphics, **flow** charts, videos, role playing, and *hands-on-call* training, to stimulate the CA's ability to learn.

New hires receive training in Deaf Culture, ASL translation, Oral Deaf, and sensitivity to the needs of persons with hearing and speech disabilities by a qualified



person who, if not deaf or hearing-impaired, possesses extensive knowledge in this area. During the **CA's** initial training, he/she is trained and evaluated on how to accurately reflect the TTY user's intent and on the CA's role in the relay process. CAs' performance based skills such as **grammar**, spelling and oral communication abilities are evaluated. Sprint works closely with local deaf and hard of hearing communities to identify knowledgeable presenters to assist with the training. Additionally, applicants are given four written and hands-on evaluations to demonstrate their ability to spell and type accurately and to process a call using live training terminals and role-plays written in varying levels of **ASL**. CAs also receive extensive training on how to improve their interpersonal **skills** so that they can work effectively with difficult and stressful situations that may arise during their employment.

Please review the Sprint TRS, Speech to Speech (STS) and Video Relay Service (VRS) Training outlines in Exhibit B.

A team of **ASL** fluent Sprint employees developed ASL Training workbooks that are utilized by CAs for ongoing training. These workbooks have been designed to provide supplemental training and to assist CAs toward the mastery of ASL translation on relay calls.

iii) Minimum typing speed of 60 words per minute.

All Sprint CAs type a *minimum* of 60-words per min (**wpm**). Sprint utilizes an oral-to-type test that simulates actual working conditions. CAs are tested on an ongoing basis to ensure that a 60-word-per-minute performance requirement is maintained.

The scores for each CA are the actual words-per-minute typed. Sprint utilizes technological aides during relaying such as pre-programmed macros and auto-correcting software, along with the CA's natural skill, to provide optimal service.

The average typing speed at the two Texas centers is 68 wpm.

iv) CA Quality Assurance Programs.

- Individual Monthly Survey. Monthly surveys and formal reviews are used to monitor and evaluate the continuing training for our CAs. It evaluates **all** areas of work performance, personal effectiveness and attendance. The survey process goals are to respond to customer feedback and to provide the CA with clearly defined and objective performance measures. Two surveys are completed on each CA every month and include areas such as Typing Accuracy, Spelling, Conversational English/ASL Translation, Clarity / Enunciation, Caller Control, and Etiquette/Composure.
- Quality Assurance Test Calls. To ensure that all CAs are focused on FCC requirements and state contractual commitments, supervisors from every center pair up to perform 10 scripted test calls each on alternate centers for a total of 700 test calls. After each call, the supervisors fax the survey form to the appropriate center for the CA to receive immediate feedback. This feedback and appropriate guiding performance measures for specific components are addressed with each CA.
- Account Management and Trainer Test Calls. Additionally, the Operations department and members of the Account Management Team identify **areas** of

concern based on customer feedback, state feedback, individual survey results and customer contacts. Approximately 300 test calls per month are conducted focusing on the identified monthly call-processing topic. Results are compiled and shared with Operations' management. Based on the results, the trainers and management determine if refresher training is required and what method will **be** used for delivery.

(2) Confidentiality and Conversation Content.

Confidentiality for Relay Texas users is required by the Texas Human Resources Code, §82.002 (Vernon 1991 Supp. 1995). (Exhibit C) This law stipulates that a “qualified interpreter” and “relay agent” (same as CA) may not disclose or be compelled **to** disclose, through reporting, testimony, or subpoena, the contents of any relayed conversation. The law also stipulates that interpreters and relay agents commit a Class C misdemeanor’ if they disclose the contents of any conversation, unless they obtain the consent of each party to the conversation. Additionally, Sprint requires CAs to sign the Relay Texas Code of Ethical Behavior affidavit, (Exhibit D) pledging adherence to RT rules and regulations. Any breach of this Code will result in disciplinary action that may result in termination of the CA.

Texas and Sprint understand that measures to ensure confidentiality **are** crucial to the success of any TRS operation and have implemented procedural and environmental measures to safeguard customer **and** call information. **In** accordance with the **FCC** regulations, all information provided for call set up, including customer database and

branding information, remains confidential and cannot be used for any other purpose.

Sprint also prohibits the use of any information obtained during the processing of a call ~~with~~ a limited exception for STS calls.<sup>2</sup> **After the inbound party disconnects**, CAs lose the ability to view or access any information pertaining to that call. No written or taped information regarding the call is kept after the call **is** released from *the* CA position.

After the call has been terminated, the billing information is transferred **to** the billing files and is no longer accessible except for billing purposes.

No one is permitted to watch or listen to actual calls except CAs and supervisory staff for the purpose of relaying, assisting or monitoring the call or for training purposes.

CAs perform their work in cubicles that are bordered by high sound-absorption acoustic tiles and they wear special noise reducing headsets. The cubicles are arranged to minimize the number of cubicles that are side by side. The **CA** work areas have a security card key access and visitors are not allowed in **CA** work **areas**. These special equipment and environmental arrangements reduce noise interference and supports confidentiality.

All relay center personnel are required to sign and abide by **a** pledge of confidentiality that is a promise not to disclose the identity of any caller or any information learned during the course of relaying calls. Employees are expected to abide by the pledge of confidentiality during and after their period of employment. Sprint's confidentiality policies are strictly enforced.

i) Confidentiality Policy CAs.

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<sup>1</sup> An individual adjudged **guilty** of a Class C misdemeanor shall be punished by a fine not to exceed \$500. Chapter 12 Texas Penal Code, §12.23.

<sup>2</sup> See Secnon (a)(2)(v): STS Limited Exception of Retention of Information

- Prospective CAs are screened in the interview process on issues regarding ethics and confidentiality. During initial training, CAs are presented with examples of situations that could be considered breaches of confidentiality.
- Stress can be a factor in maintaining confidentiality. CAs receive training on healthy detachment. When CAs require counseling due to a stressful call, they do not discuss any specifics about the call. Sprint contracts with professional agencies to provide its employees with the confidential assistance of professionally certified counselors.
- Breach of confidentiality. All claims of breach of confidentiality are fully investigated. If the investigation confirms that any employee committed a breach of confidentiality, the employee will be terminated.

ii) Security at the Relay Texas Centers.

- **CA** center has security key access.
- Visitors are not allowed in the CA work area.
- **CA** terminals screens are not visible from any window area.

iii) Objectivity

- CAs are not to advise, counsel, or interject personal opinions, even when asked to do so by the relay user. CAs do not make judgments on the content of the relay calls.
- ~~CAs~~ convey, in their tone of voice, the conversation ~~typed~~ and not personal emotional responses.

iv) CA Translation Policy.

- CAs relay everything that is said and everything that is heard. CAs do not omit or censor any aspect of the relay call. CAs convey all conversation content, including profanity. All conversation during initial call set-up and acceptance of charges from the called party is relayed. All comments to either party by the CA are relayed and typed in parentheses. CAs are prohibited from intentionally altering a relayed conversation and, to the extent that it is not consistent with federal, state or local law regarding use of telephone company facilities for illegal purposes, must relay all conversation verbatim<sup>3</sup> unless the relay user specifically requests summarization. Training is provided on various levels of English/ASL during the initial training, as well as throughout a CAs employment. In order to finish training successfully, the CA must demonstrate competent skills to translate the calls as requested.

v) STS Limited Exception of Retention of Information.

- At the request of a caller, Sprint Speech-to-Speech (STS) CAs will retain information from a call in order to facilitate the completion of consecutive calls. No information is **kept** after the inbound call is released from the CA position.

vi) STS Facilitation of Communication

- Sprint STS CAs receive training on how to facilitate STS communication without interfering with the independence of the user. STS CAs are evaluated on monthly

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<sup>3</sup> CAs are trained to convey verbatim from voice to **typed** text. CAs are trained to interpret **typed** ASL to conversational English without altering the context of the conversation.

on their ability to facilitate the call without altering content of the conversation or compromising the user's control. Sprint relay users have full control of all of their relay calls.

(3) Types of Calls.

- i) Sprint provides **24** hour, 7 day-a-week Telecommunications Relay Service (TRS) for standard (voice), Text Telephone (TTY), wireless, or personal computers (PC) users to place local, intrastate, interstate, and international calls.
- ii) Sprint also processes calls to directory assistance and to toll free numbers.
- iii) There are no restrictions on the duration or number of calls placed by any relay user.  
**All** relay users accessing Sprint retain full control of the length and number of calls placed at anytime through relay.
- iv) Sprint processes international calls to and from anywhere in the world.
- v) Extended Area Service (**EAS**) is available to all residents. This ensures that TRS callers are not billed for toll usage when completing **EAS** calls, including calls made by or to subscribers of optional EAS<sup>4</sup>.
- vi) Sprint **works** in conjunction with the Local Exchange Enhanced Services to provide additional functionality for users of TRS. Sprint processes collect and person-to-person calls and calls charged to a third-party as well as calls billed to prepaid and non-proprietary calling cards offered by the local or any other interexchange carrier.

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<sup>4</sup> Due to LEC proprietary issues, Sprint uses various "mileage-bands" in different parts of the state to mirror the EAS plans offered by the LECs to ensure that EAS users are not double-billed. For example, the mileage band in Dallas/Ft. Worth will be 70 miles to encompass the EAS plans offered by SWB or GTE. In other areas mileage-band may be 40 or 50 miles depending on the information obtained from the LEC's existing **EAS plans**.

Sprint will also process calls to or from restricted lines e.g. hotel rooms and pay telephones.

vii) When a long distance TRS call **is** placed through Relay **Texas**, the user will be billed in the same manner that a non-relay user would be billed. The relay user will only be billed for conversation time, (which does not include call setup time, in between calls and wrap up time) on toll calls. Billing will occur within **60** days of the call date. Sprint gives users the option of billing their calls to a non-proprietary LEC (local) or IXC (long distance) calling cards. Sprint will process calling cards offered by the user's carrier of choice if the carrier is a participant of Sprint's Carrier of Choice (COC) program and as long as Feature Group D is at the Carrier's access tandem. Sprint works with the LECs and IXCs to compile and make available to all TTY users a list of acceptable calling cards. The user's carrier of choice is responsible for providing call types and available billing options, and **will** also handle the rating and invoicing of toll calls placed through the relay. RT offers the capacity for accessing 900 services.

viii) Directory assistance service is available for relay users in **Texas**.

**Note:** A complete list of all call types provided by Sprint may be found in Exhibit E, Sprint Standard Features Matrix.

(4) Handling of Emergency Calls.

**Sprint** uses a system for incoming emergency calls that automatically and immediately transfers the relay user to the nearest Public Safety Answering Point (PSAP). Sprint considers an emergency call to be one in which the user of the relay service indicates they



need the police, fire department, paramedics, or ambulance. The following steps will be taken to connect the caller to the correct PSAP

- The CA, when told by a TTY/ASCII user (non-voice) that **an** emergency exists, will hit a “hot **key**”.
- The CA’s terminal sends a query to the E911 database containing the caller’s geographic area **ANI**.
- The database responds with the telephone number of the PSAP that covers the geographic source of the call, and then, automatically dials the PSAP number, and automatically passes the caller’s **ANI** to the E911 service center.

The CA remains on the line until emergency personnel arrive on the scene unless previously released by the caller. The CA also verbally passes the caller’s ANI onto the E911 center operator. If the inbound relay caller disconnects prior to reaching E911, the CA will stay on the line to verbally provide the caller’s ANI to the E911 center operator.

Note: The **Texas** Commission on State Emergency Communications (CSEC) requires the capacity of transmitting TTYs in all workstations of Public Service Answering Points (PSAPs) to make 9-1-1 accessible to TTY users. CSEC also requires the placement of a TTY machine at the PSAP as a backup in the event that workstations fail. The Texas PUC, Sprint, Texas Commission for the Deaf & Hard-of-Hearing, Texas Association of the Deaf, the Self-Help Hard-of-Hearing, CSEC, and the Texas Deaf-Blind Association are actively instructing TTY users to **dial** 9-1-1, rather than calling RT, to obtain emergency help. These **aggressive** outreach efforts have helped reduce emergency calls to the RT center. During the last 6 months, Relay Texas averaged **42** emergency calls a month. People **are** informed of the

greater speed and reliability of dialing the 9-1-1 service directly. However, Relay Texas remains committed to the fastest and most effective means of processing emergency calls made through TRS.

(5) In-Call Replacement of CAs.

i) Ten and Fifteen Minute Rule Policy.

Sprint understands that a change of CAs can interrupt the natural call flow.

Therefore, Sprint **strives** to keep the same CA dedicated to each call. Sprint **will** ensure that the CA remains **on** the call for at least 10 minutes (**or** 15 minutes for Speech-to-Speech calls). If a change of CA is unavoidable, CAs are trained to make this transition as smoothly as possible and to inform both parties.

**A CA** change may occur for the following reasons:

- Customer requests change of CA
- End user verbally abuses CA or uses obscenity towards **CA**
- The call requires a specialist (Speech to Speech, another language)
- Illness
- Potential conflict of interest (i.e. the CA identifies an end user as a **family** member or friend)
- Scheduled Breaks or Shift Changes

In instances where it is necessary to change CAs, a second CA will plug in a headset at the position and watch the call for several minutes in order to assess the “**spirit**” of the call and to make the transition smoother. After several minutes of observation, the second **CA** will wait until the voice person stops speaking and all conversation has been

relayed and will then type to the TTY user:

(CA# CONTINUING UR CALL).

The CA will say to the non-TTY **user**:

“THIS IS CA # CONTINUING YOUR CALL.”

During initial training, trainees are required to practice this procedure. In addition, a training video was developed that clearly shows the procedure and how to ensure that the transition is as smooth as possible.

(6) Gender Preferences

- i) When a Sprint relay user requests a CA of the opposite gender to the CA who initially receives the call, the relay user is switched to ~~an~~ appropriate CA as soon as one becomes available. If a change of CA is necessary during the call, every attempt will be made to accommodate the previous gender request.

(7) STS Called Numbers.

- i) Sprint’s relay customer database is available to Speech-to-Speech (STS) users. The database can be used to store a list of names, frequently dialed telephone numbers, and customer notes. The database automatically appears on the CA’s terminal screen each time a user dials into one of the Sprint relay numbers. The customer database helps to facilitate call set up and conversing preferences for the STS user. Customer profile information contained in the Sprint Customer Database will be transferred to any new provider at the end of the contract term

(b) Technical Standards

(1) ASCII & Baudot

Each Sprint **CA** position is capable of receiving and transmitting in voice, Baudot, (including Fast Type™, TurboCode™ and E-TurboCode™) and **ASCII** codes. Upon a call being received at the CA position, TTY signals *are* automatically identified as either Baudot or ASCII; if ASCII, the baud rate is detected. ASCII rates up to and including 19,200bps are supported by the Sprint platform. The domestic TTY baud rate of 45.5 and the international rate of 50 baud are also supported. Intelligent modems allow the CA to handle either voice or data lines from the same CA work station.

This automatic identification of call types for incoming calls provides a quick and efficient technique for varied customer input and reduces the average CA work time to a minimum.

- (2) Speed of Answer. RT's requirement for average answer time is the same as the industry standard: to maintain an average answer time of 3.3 seconds per call **and** allow no more than 30 seconds to elapse between the receipt of dialing information and the dialing of the requested number. The PUC relies on the Sprint Monthly Invoice to determine ASA for the month. (See attached PDF file, Texas TRS Supplemental.pdf) The monthly average ASA has been maintained during the last five years, failing to meet the 3.3 second average in only three months: January 1998 (3.9). June 1998 (5.1) and January 1999
- (4.2).** RT has multiple overlapping shifts throughout the day. RT also relies on historical data and projected *growth* to anticipate peaks and valleys. This system allows **Sprint** to meet demands during the peak-hour load, yet be cost-effective. RT's grade of service requirement is the same as the industry standard, which is one busy signal out of 100

attempts. During the peak-hours or an unexpected spike, calls are sometimes put in queue. However, the average answer time of less than 3.3 seconds per call during the last five years with exception of three months indicates that RT is meeting the minimum standards. For a description of Sprint's Quality Assurance Program on Speed of Answer, see Exhibit F.

(3) Equal Access to Interexchange Carriers

Sprint provides Texas callers with the ability to have their intrastate, interstate and international calls carried by any Interexchange carrier who has agreed to participate in the Texas Carrier of Choice (COC) program. When a caller indicates his/her COC preference, the CA will verify that the requested carrier is a COC participant, if it is, the call **will** be routed accordingly. Callers **will** be able to use any billing method made available by the requested carrier including collect, third party, prepaid and calling cards.

The current participating members of Sprint Carrier of Choice program are:

AT&T  
Bestline  
Birch Telecomm  
Broadwing Communications  
Broadwing Telecommunications  
Century Telecom  
Coastal Telephone Company  
Excel  
Global Crossings LTD  
LDDS  
Lightyear Communications, Inc  
MCIWorldCom  
McLeod USA  
Metromedia  
OPEX Long Distance

- . Qwest
- . Sage Telecom
- . SimCom
- . Sprint
- . TEX-AN (Texas State network)
- . Verizon Long Distance
- . WilTel
- . Working Assets
- . WorldCom
- . 10-10-220 (Telecom USA/ MCI)
- . 10-10-275 (WorldxChange)
- . 10-10-321 (Telecom USA/ MCI)
- . 10-10-502 (WorldxChange)
- . 10-10-629 (WorldxChange)
- . 10-10-636 (Clear Choice Five Talk)
- . 10-10-781 (WorldxChange)
- . 10-10-811 (VarTec FiveLine)
- . 10-10-834 (WorldxChange)

If a Texas caller does not indicate a COC preference to the CA either on-line or in the caller's customer database (or if the preferred carrier is not a COC participant), the call will be carried over the Sprint network. As with calls carried by Sprint, most COC participants limit billing methods based on the type of line from which the call originates. When the requested carrier is not a COC participant, Sprint has established a procedure whereby the carrier will be notified, verbally and in writing, of its obligation to provide access to TRS users and to encourage participation. The reactive procedure encourages the COC's participation; that is, a relay customer initiates and brings this to the attention of Sprint, failing that then to the PUC. So far all COC's who have been notified through this process have been willing to work with Sprint to be listed as part of TRS's COC listing.

Please see Exhibit G for a sample of Sprint's Carrier of Choice letter.

**(4) TRS Facilities.**

Sprint TRS and Sprint Relay Customer Service are both available **24** hours a day, every day of the year. Sprint utilizes both *UPS* and backup power generators to ensure that the relay centers have uninterrupted power even in the event of a power outage. UPS is used only long enough for the backup power generators to come on line – a matter of minutes. The backup power generators are supplied with sufficient fuel to maintain operations for at least **24** hours. The generators can stay in service for longer periods of time as long as fuel is available.

In the event of a power outage, the UPS and backup power generator ensure seamless power transition until normal power is restored. While this transition is in progress, power to all of the basic equipment and facilities essential to the center's operation is maintained. This includes:

- Switch system and peripherals
- Switch room environmental
- **CA** positions (consoles/terminals and emergency lights)
- Emergency lights (self-contained batteries)
- System alarms
- CDR recording

**As** a safety precaution (in case of a fire during a power failure), the fire suppression system is not electrically powered. Once the back-up generator is on line, stable power is established and maintained to all TRS system equipment and facility environmental control until

commercial power is restored. Please refer to the Disaster Recovery Plan provided in Exhibit H, for a complete explanation of Sprint's back-up plan.

(5) Technology

Texas is proud that in the history of Relay Texas, the service has presented many "firsts". Video Relay Service is the newest feature that Relay Texas has for Texas and nationwide coverage. Here are the following features provided:

- Voice Carry Over.

Sprint has provided voice and hearing carryover as standard TRS features longer than any other provider. Voice carryover (VCO) allows a user to speak directly to the person he/she is calling and to receive responses by text through the CA (and vice-versa). In addition, Sprint supports VCO-VCO, VCO-HCO, VCO-TTY, and Two Line VCO calls.

- Hearing Carry Over.

Hearing carryover (HCO) allows a person to listen directly to the person called and to provide a response by text through the CA (and vice-versa). Sprint was the very first relay provider to offer HCO users what is known as voice progression technology. This advancement eliminates the HCO users need for reading macros and allows him/her to hear the call set-up, ringing and the called party answering the telephone.

- Internet Protocol TRS.

Texas enjoys multi-vendoring in IPTRS by three IPTRS providers: AT&T, MCI, and Sprint. Texas does not have jurisdiction over IPTRS providers. However,



these IPTRS providers do welcome feedback from the Relay Texas administrator on quality issues. IPTRS providers offer a web-enabled, multi-language product. These IPTRS calls can take place anywhere there is an Internet connection. This feature provides a secure and interactive relay experience using intuitive features designed for TRS users.

- Video Relay Service.

Relay Texas was the first state TRS program to provide video relay service with two trials. At this time Sprint is the only provider with a web-based platform to support VRS. VRS reports are provided to the PUC monthly and on-going communication on quality issues is maintained. Users of VRS utilize video conferencing equipment and high-speed telecommunication lines to access the service. Ninety percent of VRS customers use VRS through the Internet.

11) Future Technology Developments.

Texas has always encouraged its TRS provider to constantly improve services by taking advantage of new technologies. Sprint is currently investigating future communication enhancements including, Caption Telephone and Real-Time Captioning service for conference calling, Speech to Text technology, Wireless Internet Relay through cell phone devices, wireless Video Relay accessibility and Palm Pilot and Two-Way Pager utilization through relay.

(6) Voice Mail and Interactive Menus.

When the Sprint relay caller reaches an answering machine, voice mail or interactive menu, the CA informs the relay caller by pressing a macro which reads (ANS MACH) or

(RECORDING) to keep the caller informed of the call progress. The CA then, if necessary, presses a hot key to record the voice announcement and relay the message back to the caller. The CA utilizes Sprint's recording technology to obtain all information necessary on the first attempt. The **CA** relays all of the recorded information to the customer and deletes the recorded message. This technology greatly reduces the CA **work** time, **as** the **CA** does not need to make multiple outdials. Sprint has developed a procedure using Ultra WATS lines to ensure that with additional out-dials the customer does not incur toll charges.

Callers to Sprint relay services access 900 services by dialing a free 900 number to access relay. This process ensures that the LEC will only complete those calls into the relay service that do not have a 900 number block added to their phone lines. The 900 service providers will rate and bill the **user** as if the call was dialed directly from the originating user's telephone. Texas 900 Services number is 900-230-2303.

(c) Functional Standards.

(I) Consumer Complaint Logs.

Sprint provides copies of each TRS Customer Contact form to the PUC. The form includes the date the complaint was filed, an explanation of the complaint, the date the complaint was resolved and explanation of the resolution and any other pertinent information to the Texas PUC. Further, Sprint maintains a log of each individual complaint and provides comprehensive reports on a monthly **and** annual basis to each of the states that Sprint serves. By June 25th of each calendar year, Sprint submits a 12-month complaint log report for the period of June 1 - May 31, **as** well as a summary of the

complaint log. The last 5 years there were no complaints that **were** elevated to the commission level; thus far **all** complaints were resolved at the Sprint level.

(2) Contact Persons.

On an annual basis, the Texas PUC submits information to the FCC regarding the PUC TRS contact person

The contact person for TRS related issues is:

Ed Bosson

Relay Texas Administrator

1701 N. Congress Avenue

P.O. Box 13326

Austin, Texas 78711-3326

Email Address: [ed.bosson@puc.state.tx.us](mailto:ed.bosson@puc.state.tx.us)

Phone Number: 512 936-7147 TTY

512 936-7148 Voice

512 936-7428 FAX

(3) Public Access to Information.

Public access to RT information has been and **will** be provided as follows:

Information regarding RT is published throughout Texas in the Customer Guide section of local exchange companies' (LECs') telephone directories. (See attached PDF **file, Texas TRS Supplemental.pdf**) Periodically, Texas PUC Commissioners send a letter to all LECs reminding them of their responsibility to ensure that their telephone directories contain information about RT.

- i) The Texas PUC has a designated staff member, the Relay Texas Administrator, who is responsible for ongoing publicity about RT.
- ii) RT distributes a free, quarterly newsletter featuring articles about RT issues to interested persons across the state as well as the nation. See attached PDF file, Texas TRS Supplemental.pdf
- iii) RT distributes brochures that explain how relay service operates as well as specific features and how they work. See attached PDF file, Texas TRS Supplemental.pdf
- iv) RT sponsors a Relay Ambassador Project (RAP) that allows individuals or organizations to bid on outreach projects to educate Texans regarding the use of relay service. The RAP Request for Proposals (Exhibit I) specifies the need to reach underutilized and other target areas. RT has historically had contracts that cover most of Texas by a variety of organizations and individuals.
- v) The Relay Texas Administrator maintains an Email Alert Group with a subscription of approximately 350 email addresses. The Administrator keeps the subscribers abreast of the latest news regarding TRS.
- vi) The Texas PUC and Sprint have worked with other community organizations, businesses and service providers to develop information forums, seminars, and workshops to disseminate RT information and referral support information to Texas' diverse population.

(4) Rates.

Relay Texas users are charged no more for services than standard "voice" telephone users. Relay Texas users who select Sprint as their interstate carrier, will be charged the

Sprint rate. The caller will be billed only for conversation time. Those users who select a preferred interstate carrier via the Relay Texas COC list will be charged the COC's tariffed rate and invoiced by the selected interstate carrier.

i) The Texas PUC has worked with Texas Telephone Association to make 7-1-1 fully accessible in Texas, and 7-1-1 service has been available in Texas since January 2001.

ii) RT provides the following toll-free telephone numbers:

- 1-800-735-2989 TTY, HCO, and Two-line VCO
- 1-800-735-2988 Voice;
- 1-800-735-2991 ASCII;
- 1-877-826-1789 VCO;
- 1-877-826-6607 STS;
- 1-877-826-6608 STS VCO;
- 1-800-662-4954 Spanish Relay;
- 1-877-826-9348 Reduced Typing Speed;
- 1-900-230-2303 900 Services; and
- 1-866-786-3684 VRS Voice

iii) Long distance charges are based on point-of-origination to point-of-destination and have the same toll rates as voice communication services with the regular telephone system, with respect to such factors as the duration of the call, time of the day, and the distance from the point-of-origination to the point-of-termination.

iv) RT users incur no additional telephone charges for the use of using RT.

- v) RT users who use Sprint's network over RT pay 50% of the long distance rates on intrastate calls. If the RT user selects another carrier, other network's discounts apply, whenever applicable, for both intrastate and interstate calls.

By FCC jurisdiction, Sprint has two separate Message Telephone Service rates – one for interstate and one for intrastate. The following Table exhibits the discount off Sprint's MTS rates.

	Intrnstate	Interstate
<b>Day</b> (7 AM – 6:59 PM)	50%	50%
<b>Evening</b> (7 PM – 10:59 PM)	50%	50%
<b>Night/weekend</b> (11 PM – 6:59 AM; all day Saturday & Sunday)	50%	50%

(5) Jurisdictional Separation of Costs

All Relay Texas intrastate and interstate minutes are reported separately and distinctly to the state on the Sprint invoice. The interstate and international minutes are reimbursed by the Interstate TRS Fund. The local and intrastate minutes are reimbursed by the Texas Universal Service Fund. Sprint provides separate monthly invoices for interstate and intrastate services. See attached Exhibit J, Texas PUC Substantive Rule §26.401 for additional details.

(6) Complaints.

The Texas PUC has established, with Sprint, a mechanism for receiving and resolving complaints from users of RT. Sprint provides a Customer Service toll-free voice and

TTY number (800-676-3777) 24 hours a day, 7 days a week, and **365** days a year.

Complaints may be submitted in writing, in person, or over the telephone to Sprint, the Texas PUC, or a member of the Relay Texas Advisory Committee. Most complaints are made during the call and are resolved at that time. All other complaints have been resolved within 180 days as required by the FCC. The following **are** options that relay users may choose from in directing their concerns, complaints, or commendations, either during or immediately after the relay call:

- Request that the CA contact the relay supervisor.
- Contact Texas RT account manager at 800-578-6275 TTY.
- Contact the national Sprint Service Center at 800-676-3777 TTY/Voice.
- Contact the Texas PUC at 888-782-8477 (Voice), or the RT Administrator at 512/936-7147 (TTY).
- Submit concerns to the Relay Texas Advisory Committee.
- Send an email with concerns to [relaytx@puc.state.tx.us](mailto:relaytx@puc.state.tx.us)

ii) Some complaints may be filed directly with the Federal Communications

Commission (FCC) Common Carrier Bureau without initially going through the internal complaint mechanism available in Texas.

iii) Procedures & Remedies

Sprint has a comprehensive Customer Complaint Tracking program. A supervisor or Operations Administrator is available 24 hours a day to accept and document complaints, and to forward the documentation to the proper source for resolution. Supervisors provide immediate feedback to both the customer and the CA.

Sprint **will** provide copies of each TRS Customer Contact form, which includes the date the complaint was filed, an explanation of the complaint, the date the complaint **was** resolved and explanation of the resolution **and** any other **p**ertinent information to the Texas PUC. Further, Sprint maintains a log of each individual complaint and provides comprehensive reports on a monthly and annual basis to each state Sprint Serves (Exhibit K, Sprint Complaint Log).

The complaint resolution procedure outlines the steps to ensure complaints are resolved within 180 days of filing. If the complaint concerns a specific **CA**, an Operations Supervisor follows up and resolves the complaint. The role of the supervisor is to:

- Accept all types of complaints, issues and comments
- Handle all service type complaints.
- Resolve complaints with Communication Assistants.
- Follow **up** with customers if requested by the customers.

If the complaint concerns a specific technical issue, a trouble ticket is filed and **the** ticket number is documented on the customer contact form. The ticket will be investigated and resolved by an on-site technician. The Account Manager is responsible for tracking all technical complaints and following-up with customers on resolutions.

If a miscellaneous complaint is filed with customer service, a copy is faxed to the Account Manager for resolution and follow-up with the customer. Texas customers also have the option of calling the Sprint 24-hour Customer Service department (1-800-676-3777) or the Texas Account Manager to file complaints or commendations. Texans also



have the option to contact the Texas State Relay administrator if they so choose.

Sprint has the capability to transfer the caller on-line to the Customer Service department.

A Customer Service representative will always answer the calls live. The Account Manager is responsible for tracking all commendations and complaints and sending copies of Customer Contacts to the State Relay Administrator by the invoice due date of the following month.

(7) Treatment of TRS Customer Information.

The Sprint Customer Preference Database includes such items such as types of call, billing information, speed dialing, slow typing, carrier of choice, as well as emergency numbers, blocked outbound numbers, language type (English, Spanish, ASL) and call notes are included in the customer profile. At the end of the ensuing contract(s) Sprint **will** transfer all Texas database records in a usable format to the next incoming relay provider, at least 60 days prior to the last day of service.